

Jason A. Imes, Esq., NV Bar No. 7030
Schwartzter & McPherson Law Firm
2850 South Jones Blvd., Suite 1
Las Vegas NV 89146-5308
Telephone: (702) 228-7590
Facsimile: (702) 892-0122
E-Mail: bkfilings@s-mlaw.com

Proposed Attorneys for Lenard E. Schwartzter

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:

MEDIZONE INTERNATIONAL, INC.,

Debtor.

Case No. BK-S-18-12662-LEB

Chapter 7

**DECLARATION OF JASON A. IMES IN
SUPPORT OF TRUSTEE'S
EX PARTE APPLICATION TO EMPLOY
COUNSEL NUNC PRO TUNC**

(No Hearing Requested)

I, Jason A. Imes, declare the following under penalty of perjury:

1. I am an attorney and counselor at law, duly admitted to practice before all Courts of the State of Nevada and before the United States District Court for the District of Nevada.

2. I am an attorney with the Schwartzter & McPherson Law Firm ("S&MLF"). S&MLF maintains offices at 2850 South Jones Blvd., Suite 1, Las Vegas NV 89146.

3. S&MLF seeks authorization to be retained by Lenard E. Schwartzter, Chapter 7 Trustee herein, as his legal counsel and for the purpose of representing the Trustee and the bankruptcy estate as more particularly set forth in the Trustee's Application on file herein.

4. A summary of the current hourly billing rates for the Schwartzter & McPherson Law Firm is attached hereto as **Exhibit A**.

5. To the best of my knowledge, S&MLF is disinterested within the meaning of Section 101(14) of the Bankruptcy Code. S&MLF, its shareholders, counsel and associates (a) are not creditors, equity security holders, or insiders of Debtor, (b) are not and were not, within two years before the Petition Date, a director, officer, or employee of Debtor, and (c) do not hold an interest materially adverse to the interest of the estate or of any class of creditors or equity holders

1 by reason of any direct or indirect relationship to, connection with, or interest in, the Debtor, or for
2 any other reason.

3 6. Upon information and belief and to the best of my knowledge, S&MLF does not
4 represent or otherwise have other connections with the Debtor, creditors, any other party in
5 interest, their respective attorneys and accountants, the United States Trustee, or any person
6 employed in the office of the United States Trustee in this case, **EXCEPT that Lenard E.**
7 **Schwartzter is the acting Chapter 7 Panel Trustee for this case, appointed by the Office of**
8 **the United States Trustee, and Mr. Schwartzter regularly employs S&MLF to represent him**
9 **in other unrelated bankruptcy cases in which he is the Trustee. Mr. Schwartzter is also a**
10 **senior partner in S&MLF, but he will not bill as an attorney in this case. Exhibit B** sets forth
11 the names reviewed to identify any connection or relationship.

12 7. Upon information and belief and to the best of my knowledge, neither I, nor any
13 member of S&MLF, represents any interest adverse to the Debtor, creditors, any other party in
14 interest, their respective attorneys and accountants, the United States Trustee, or any person
15 employed in the office of the United States Trustee in this case, or in matters upon which S&MLF
16 will be engaged as counsel in this case.

17 8. Pursuant to FRBP 2014, this Declaration constitutes a verified statement and sets
18 forth, to the best of my knowledge, S&MLF's connections, if any, with the Debtor, creditors, any
19 other party in interest, their respective attorneys and accountants, the United States Trustee, or any
20 person employed in the office of the United States Trustee in this case.

21 9. S&MLF expects that its compensation will be based upon a combination of factors,
22 including without limitation, experience of counsel, time expended, results achieved, difficulty of
23 matters undertaken and S&MLF's hourly rates billed at the rate of \$385.00 for Jason A. Imes and
24 various hourly rates for other counsel and support staff within S&MLF as set forth in **Exhibit "A"**
25 to this Declaration. S&MLF will not seek to raise the rates of any member of S&MLF for a
26 minimum of six (6) months after the date of the entry of the order approving its employment.
27 S&MLF reserves the right to seek an increase in hourly rates in accord with the United States
28 Trustee's Guideline on this matter.

1 10. No payments have been made or promised to S&MLF for services rendered in any
2 capacity whatsoever in connection with the Chapter 7 Case. There is no agreement or
3 understanding between S&MLF or any other entity for the sharing of compensation to be received
4 for services rendered in or in connection with this Chapter 7 case.

5 DATED: May 11, 2018

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7 _____
 /s/Jason A. Imes

8 Jason A. Imes, Esq.

9 Schwartzter & McPherson Law Firm

10 2850 S. Jones, Blvd., Suite 1

11 Las Vegas, NV 89146

12 Tel: (702) 228-7590

13 *Proposed Counsel for Lenard E. Schwartzter, Trustee*
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SCHWARTZER & MCPHERSON LAW FIRM
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Las Vegas, Nevada 89146-5308
Tel: (702) 228-7590 · Fax: (702) 892-0122

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EXHIBIT A

SCHWARTZER & MCPHERSON LAW FIRM
BILLING RATES AS OF JANUARY 1, 2016

ATTORNEYS

Jeanette E. McPherson	(JEM)	\$450
Jason A. Imes	(JAI)	\$385

PARALEGALS / LEGAL ASSISTANTS

Angela Hosey	(AFH)	\$150
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EXHIBIT B

This information is being provided in connection with the Declaration of Jason Imes supporting the *Trustee's Ex Parte Application to Employ Counsel Nunc Pro Tunc*. The following names were reviewed to identify any connection or relationship:

Creditors listed on Schedule D

Creditors listed on Schedule F

Parties listed on Statement of Financial Affairs and on Mailing Matrix